

**THIS IS A NOTICE OF YOUR RIGHTS  
REGARDING PENDING CLAIM CONCERNING YOUR WAGES**

If you have worked at RX2GO, Inc.  
at any time between September 28, 2020 and \_\_\_\_\_,  
a pending action may affect your legal rights.

If you need translation of this document,  
you may submit a request for a translation into your language by emailing  
[admin@andersondodson.com](mailto:admin@andersondodson.com) or calling (212) 961-7639.

**NOTICE OF YOUR RIGHTS**  
**REGARDING PENDING CLAIM CONCERNING YOUR WAGES**

**If you have worked for RX2GO, Inc.  
at any time between September 28, 2020 and \_\_\_\_\_, 2024,  
a pending action may affect your legal rights.**

*Important: You are NOT being sued. This Notice is NOT a solicitation from a lawyer.  
Also, if you qualify, you are eligible to make a claim no matter what your immigration status is.*

- Former employees of RX2GO, Inc. (“Plaintiffs”) are suing a **RX2GO, INC.** and its owner, **ERKIN SATTAROV** (together with the companies referred to as “Defendants”) regarding wages.
- The Plaintiffs claim that RX2GO, Inc. underpaid them and others working there in several ways including not properly paying wages and tips correctly. To address these issues, they filed a claim on behalf of themselves and all other drivers / delivery persons who have worked for Defendants under the Fair Labor Standards Act (“FLSA”) and New York Labor Law (“NYLL”). Now they are inviting you to join in this claim.
- The Court has not decided whether Plaintiffs or Defendants are correct regarding any person who has been sent this Notice. However, if you worked for RX2GO, Inc. any time between September 28, 2020 and \_\_\_\_\_, 2024, your rights may be affected, and you have a choice to make now:

YOUR RIGHTS AND OPTIONS IN THIS CLAIM	
RETURN YOUR COMPLETED FORM	If you complete and return the attached form, you will become a part of this action and may be eligible to share in any proceeds from a settlement or judgment if there is one. By joining, you give up your right to separately sue RX2GO, Inc. about the same claim and if the Plaintiffs do not win, you will be bound by that decision.
DO NOTHING	By doing nothing, you will not be included in this action at this time. You will be doing nothing one way or the other in regard to any federal minimum wage, overtime or other federal wage claim you might have. This means that you may be giving up the possibility of getting money or benefits that may come from a trial or settlement of the minimum wage or overtime claims under federal law asserted in this claim. However, you would retain your rights going forward, subject to the applicable Statute of Limitations.

## **1. Why did I get this notice?**

You are getting this notice because Defendants' records show that you may have worked for them as an hourly paid worker at some point between September 28, 2020 and the present.

## **2. What is a collective action and who is involved?**

In a collective action, one or more individuals bring a claim on behalf of themselves and others who have similar claims. The individuals who brought this claim are called the Plaintiffs. The companies and individual that they have sued are called the Defendants. One Court resolves the issues for everyone who decides to join the case. This case was filed in federal court in Brooklyn (United States District Court, Eastern District New York), Case No. 1:23-cv-07256-PK.

## **3. What is this claim about?**

This action is about whether Defendants' compensation practices have violated federal law (the Fair Labor Standards Act, or FLSA) and/or state law (the New York Labor Law, or NYLL). The Plaintiffs allege that Defendants violated the law by not paying its employees all wages owed, including minimum wage and tips. Plaintiffs are seeking to recover underpaid wages, in addition to liquidated damages, attorneys' fees, and costs. Defendants dispute these claims.

## **4. What is the purpose and effect of this notice?**

This notice is for the sole purpose of inviting similarly affected employees to become involved in this case. If you elect to join this proceeding, you may share in any settlement or judgment if the Plaintiffs are successful. There are no assurances that any recovery will be awarded.

## **5. What happens if I do nothing at all?**

You will not be included in this claim for the purpose of asserting a wage or overtime claim under federal law. Therefore, you will likely not be entitled to any recovery in this case should there be any for those claims. The limitations period on your claims continues to run. A claim under the FLSA must be brought within two (2) years of the date the claim accrues, unless you can prove that your employer's violation was "willful," in which case the claim must be brought within three (3) years. (The New York Labor Law's equivalent is six years.)

## **6. How do I join this collective action claim?**

To participate in this claim, you must fill out the enclosed form called "Consent to Join" and return it to Plaintiff's lawyers in any of the following ways:

### **BY ELECTRONIC SIGNATURE:**

Click the DocuSign link provided to you and complete where indicated  
(or if you did not get one, you can email [penn@andersondodson.com](mailto:penn@andersondodson.com) and request a link)

--OR--

**YOU CAN SCAN AND EMAIL IT TO**

[admin@andersondodson.com](mailto:admin@andersondodson.com)

--OR--

**TEXT A PICTURE OF IT TO**

(720) 647-7193

--OR--

**MAIL IT TO:**

AndersonDodson, P.C.

Receiving Center PMB 255

196 Alps Rd Ste 2

Athens GA 30606

--OR--

**FAX IT TO**

(646) 998-8051

The signed Consent to Join form must be postmarked or received by \_\_\_\_\_ [60 days from the mailing of this notice]. If your signed Consent to Join form is not e-signed, postmarked, faxed, or e-mailed by \_\_\_\_\_ [60 days], you may not be allowed to participate in the federal law portion of this claim.

**7. If I join, will there be any impact on my employment?**

Federal law prohibits Defendants from terminating or in any other manner retaliating against you because you join this case or have in any other way exercised your rights under federal law.

**8. Will I Have Any Obligation If I Join This Lawsuit?**

If you join this lawsuit, you may be required to give testimony and/or produce documents and information about your alleged employment.

**9. Can I participate in this collective action claim regardless of my immigration status?**

Yes. Your rights under this federal law are protected regardless of your immigration status.

**10. Do I have a lawyer in this case?**

The existing Plaintiff and any others who may join this action will be represented by the law firm, AndersonDodson, P.C. unless you specify that you want someone else to represent you and make arrangements accordingly. You may learn more about this firm at [www.AndersonDodson.com](http://www.AndersonDodson.com). If you join this claim, this firm will represent you on a contingency fee basis, which means they only get paid if the claim is successful. You will not owe any attorneys' fees out of your pocket; the attorneys will be paid out of the judgment or settlement.

**11. FURTHER INFORMATION**

Further information about this claim or this notice can be obtained by contacting Plaintiff's Counsel at **(212) 961-7639** or the address, email or fax number provided above.